

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-11 If any Bell Atlantic affiliate currently provides DSL services, does the current rate offered by such Bell Atlantic affiliate(s) include a Residential Service Contribution Rate Element? If "yes", please explain how the revenue associated with that element is provided to such affiliate.

REPLY: There currently are no BA affiliates offering DSL service in Massachusetts.

NET# 542

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-40 Has BAMA done any analysis of the feasibility of "conditioning" multiple spare pairs to provide xDSL-type services to communities/customers who are currently served by long copper loops? If so, please provide such analysis and identify the use to which such analysis was put, what conclusions were reached and where such analysis was used to support either in whole or in part the cost study relied upon by BAMA.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. Notwithstanding this objection, BA-MA responds as follows:

No formal study has been done. However, conditioning such long loops and rendering them useless for voice service without binding forecasts for voice and data service in an area would be inefficient because it would eat up available voice pairs, and cause BA to return and recondition some loops for voice as needed.

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D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-45 When BAMA builds new outside plant loop facilities today do BAMA's engineering guidelines recommend designing plant that will support only voice grade service or does BAMA design its facilities to support digital services as well? Please provide a copy of the BAMA engineering guidelines that support BAMA's answer to this request.

REPLY: BA-MA objects to this request on the grounds that it is irrelevant and immaterial to this proceeding. Notwithstanding this objection, BA-MA responds as follows:

Bell Atlantic designs new facilities in conformance with Carrier Serving Area guidelines which support digital as well as voice grade services. This does not mean that the plant will accommodate, without any additional work, any type of digital service being offered by a carrier today or contemplated in the future. A copy of the engineering guideline (1998-00397-OSP), will be provided subject to a suitable protective agreement.

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D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-46 Does BAMA agree that general industry guidelines suggest limits to total bridge tap for loop plant that will provide digital services? In BAMA's opinion, what is the industry guideline for bridge tap for the mix of products BAMA plans to deploy in the future?

REPLY: BA-MA specifically objects to this request on the grounds that the term "general industry guidelines" is vague and ambiguous. Notwithstanding this objection, BA-MA responds as follows:

The bridged tap limits associated with the various industry cable design guidelines differ because the guidelines were developed to support different technologies and different loop plant topologies. For example, Carrier Serving Area design guidelines are applicable to new construction of distribution plant beyond a carrier remote terminal. BA-MA does apply CSA guidelines to cables that terminate in a Central Office. In the past, BA-MA has designed CO-terminated metallic loop cables according to one of various resistance design guidelines or long route design guidelines. These guidelines do not limit individual bridged tap lengths but limit the total bridged tap to 6,000 feet or less for non-loaded cables. Likewise, the guidelines for loaded cable facilities do not limit individual bridged tap lengths but

limit the customer end-section length plus total end-section bridged tap to 12,000 feet or less.

In BA-MA's opinion, future loop services and technologies should be designed to accommodate the wide variety of bridged tap that is

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normally found in the loop environment. Future technologies that are limited to non-loaded facilities should be able to accommodate bridged taps totaling up to 6,000 feet, and technologies that can be used on loaded facilities should be able to accommodate customer end-section lengths plus total end-section bridged taps totaling up to 12,000 ft. Services and technologies that require more stringent control of bridged tap lengths should be avoided since they will either incur the additional costs associated with bridged tap removal or not be available universally.

REPLY: RL/CVD 1-46

NET# 577

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-54 Does Bell Atlantic's retail ADSL cost study submitted with Bell Atlantic's FCC tariff filing include a cost estimate for the unbundled access necessary to provide the identical configuration(s) that BAMA proposes to offer competitive carriers for line sharing? If "no," please explain why not. If "yes," please identify which cost or combination of costs study is equivalent to the configuration(s) that Bell Atlantic assumed in its retail ADSL cost study.

REPLY: BA-MA objects to this request on the grounds that the request is unreasonable because of the overly broad scope of the data requested and the burden of compliance. Further, BA-MA objects to this request because it seeks to have BA-MA "describe" a document or create a special study, index, a "cross-reference" chart or other materials. Such a request is unreasonable and unduly burdensome to the extent that the information is not readily available and BA-MA is, therefore, required to undertake a time-consuming work effort.

BA-MA further objects to this request on the grounds that it seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. BA-MA also objects on the grounds that the information requested is irrelevant as it relates to services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

In addition, BA-MA specifically objects to this request, especially to the extent it seeks information on the use of packet switching in

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provisioning retail DSL service, on the grounds that such retail services are irrelevant to the cost of providing any wholesale products or services that are within the scope of this proceeding. Notwithstanding this objection, BA-MA responds as follows:

No, such an estimate was not required at the time the filing was made.

REPLY: RL/CVD 1-54

(cont'd)

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NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-60 Has BAMA developed a cost study that provides a specific cost result for the transport of DSL service related data over BAMA's fiber feeder facilities? If "yes," please identify the specific location of that result and of any supporting discussion. If "no," please explain why BAMA has not provided a cost study to support that capability.

REPLY: A detailed cost study to transport DSL service related data over fiber feeder facilities has not been developed. A broad gauge architectural study to determine feasibility of deploying DSL at remote sites has been conducted, but BA-MA is still in the process of determining the parameters and costs for the component parts of such a deployment and has not reached the point where a detailed cost study could be performed.

NET# 591

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-64 Please provide all correspondence and other written materials (including slides) provided by Bell Atlantic or any affiliate to any state commissioners, state commission staff, Attorneys General, or consumer advocates regarding its DSL and/or line sharing deployment plans.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to retail services provided by a Bell Atlantic affiliate not regulated by the Department and are highly confidential, competitively sensitive business planning documents, which are inappropriate and unnecessary to share with competitors in this proceeding and, in any event, are not relevant to the issues to be decided.

Notwithstanding this objection, BA-MA responds as follows:

To the best of the witness' knowledge BA-MA has provided no such materials regarding its retail deployment plans to the Massachusetts D.T.E. or the Attorney General. However, information and timelines regarding Line Sharing deployment have been made available in the DSL/Line Sharing collaboratives and are available on the New York Public Service Commission's public web-site.

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NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry Services

REQUEST:	Rhythms Links Inc. and Covad Communications Company, Set #1
DATED:	June 5, 2000
ITEM: RL/CVD 1-80	Please provide Bell Atlantic's Network Planning Document (NP-DP-99-155).
SUPPLEMENTAL	BA-MA considers this document to be proprietary and competitively sensitive and, therefore, will provide that document subject to a duly
REPLY:	executed protective agreement.

NET# 611S

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-81 Please state the dates that Bell Atlantic first offered Infospeed DSL service in Maryland, Massachusetts, New York, and Pennsylvania.

REPLY:

- Maryland – October 1998
- Massachusetts - January 2000
- New York – January 2000
- Pennsylvania - October 1998

NET# 612

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Bruce Meacham

Title: Senior Specialist

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-83 Please provide all studies that Bell Atlantic has conducted showing that per-line costs of deploying Hekimian wideband testing equipment are less than the average costs per line of dispatching technicians to clear troubles on loops used for xDSL services.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to Bell Atlantic Corporation or a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

Notwithstanding its objection, BA-MA responds as follows:

Cost-Benefit analysis performed to justify the deployment of the wideband testing system is contained in Bell Atlantic Corporation's Network Planning Document (NP-DP-99-155). See BA-MA's Supplemental Reply to RL/CVD 1-80.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-85 Please state the average interval in which Bell Atlantic provisions
Infospeed DSL.

REPLY: BA-MA objects to this request on the grounds that it is overly broad
and unduly burdensome and seeks information that is irrelevant,
immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested
is irrelevant as it relates to retail services provided by a Bell Atlantic
affiliate not regulated by the Department, and may be confidential in
nature.

Notwithstanding this objection, BA-MA responds as follows:

The average provisioning interval for Infospeed DSL in MA is 15
business days.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-89 Please provide any documents that address or analyze the expected interval for provisioning line sharing arrangements.

REPLY: BA-MA objects to this request on the grounds that the request is overly broad and unduly burdensome in that it requires the production of "any documents." BA-MA will make available sufficient information to respond to or otherwise describe or identify BA-MA's policies, practices or position regarding the subject matter of the request.

Notwithstanding this objection, BA-MA responds:

Intervals for provisioning line sharing arrangements are addressed in the Interconnection Agreements. The subject is also discussed in the Direct Testimony of Ms. Stern, filed on June 14, 2000, pages 16-20.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-90 Please provide any documents that address or analyze the interval for provisioning Infospeed DSL services.

REPLY: BA-MA objects to this request on the grounds that it is overly broad and unduly burdensome in that it requires the production of "any documents."

BA-MA further objects on the grounds that the information requested is irrelevant, immaterial and beyond the scope of this proceeding as it relates to retail services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

Notwithstanding this objection, BA-MA responds as follows:

The current standard interval for provisioning Infospeed DSL services is 15 business days. This was developed from an analysis of initial service delivery problems and is composed of 8 day Network Due

Date as part of the overall 15 day Service Due Date.

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NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-97 Please state whether Bell Atlantic will provide Line-Station Transfers for line shared loops.

REPLY: As defined in paragraph 26 of the FCC's *Line Sharing Order*, line-sharing pertains to the sharing of the high frequency portion of an *existing* copper loop providing service, and not sharing a loop which must be created for a CLEC's benefit.

Because of the complexities involved, line station transfer ("LSTs") should not be required for line-shared loops, as explained in the Direct Testimony of Ms. Stern filed on June 14, 2000 (page 45). Furthermore, nothing in the FCC's *Order* compels such transfers.

NET# 628

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-99 Has Bell Atlantic Corporation developed methods and procedures for working with any affiliated company to provide any DSL service in a line sharing arrangement? If so, please provide a complete copy of that documentation. Please note that this request specifically includes information that is in draft format or otherwise under development.

REPLY:

BA-MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to Bell Atlantic Corporation or a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

Notwithstanding this objection, BA-MA responds as follows:

While Bell Atlantic has initiated negotiations for line sharing arrangements with Bell Atlantic Network Data Inc. ("BANDI") in NY, there are no methods and procedures currently available.

NET# 630

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry Services

REQUEST:

Rhythms Links Inc. and Covad Communications Company, Set #1

DATED:

June 5, 2000

ITEM: RL/CVD 1-96

Please provide any cost support that Bell Atlantic submitted to the FCC

for Infospeed DSL.

SUPPLEMENTAL

REPLY:

BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

Notwithstanding these objections, BA-MA responds as follows:

Attachment 1 is the Description and Justification of BA's Infospeed DSL cost study filed with the FCC.

Attachment 2, consists of the Infospeed DSL cost study filed with the FCC. To the extent that all or part of this material is considered proprietary and was afforded confidential treatment by the FCC, BA-MA requests the same treatment in this proceeding and will provide the data subject to a mutually agreeable Protective Agreement.

NET# 627S

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-111 Will the decision to establish a separate subsidiary to provide DSL

services in any way affect BA's \$800 million commitment to Alcatel to purchase ADSL electronics for integrating Alcatel's 1000 ADSL ATM Subscriber Access Multiplexer (ASAM) TM and LitespanTM Next Generation Digital Loop Carrier (NGDLC) solutions (see Alcatel and Bell Atlantic press release of April 8, 1999, Available at http://www.alcatel.com/press/current/1999/04_08.htm)? If so, please describe specifically how that commitment would be or is affected.

ERRATA

REPLY:

BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature. Notwithstanding its objection, BA-MA responds as follows:

The commitment referred to by Covad is not a commitment to purchase any set quantity of a specific type of equipment from Alcatel. It is a market share contract (i.e., Bell Atlantic agrees to purchase at least "x" percent of the types of equipment specified in the contract, in terms of units, from Alcatel). Also, the commitment was for voice and data equipment and the \$800 million amount cited is an estimate of the value of total purchases over the five-year term of the contract. It would be premature at this point for Bell Atlantic to speculate on the impact on a contract that has just commenced.

NET# 642E

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-116 Does Bell Atlantic anticipate that any "new optical remotes capable of delivering its retail ADSL service offering to end users" will be available to CLECs on an unbundled basis.

REPLY: BA-MA objects to this request on the ground that it rests in part on the mistaken premise that BA-MA, as opposed to Bell Atlantic's retail data affiliate, will continue to provide retail DSL service in Massachusetts. Notwithstanding that objection, BA-MA responds as follows:

Bell Atlantic is not in the position to anticipate whether the optical remotes will either be equipped for or available on an unbundled basis.

NET# 647

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 98-57 Phase III

Respondent: Amy Stern

Title: Director-Telecom Industry
Services

REQUEST: Rhythms Links Inc. and Covad Communications Company, Set #1

DATED: June 5, 2000

ITEM: RL/CVD 1-119 Does Bell Atlantic anticipate that any "new optical remotes capable of delivering its retail ADSL service offering to end users" will be capable of providing DSL service over multiple physical or virtual channels in a manner that allows data to be directed to different DSL service providers? If anything other than an unqualified "no," please provide a detailed discussion of that capability.

REPLY: BA-MA objects to this request on the grounds that it rests in part on the mistaken premise that BA-MA, as opposed to Bell Atlantic's retail data affiliate, will continue to provide retail DSL service in Massachusetts. Notwithstanding that objections, BA-MA responds as follows:

See BA-MA's Replies to RL/CVD 1-114 and 1-116.

NET# 650